Case 1:18-cv-08653-VEC-SDA Document 63 Filed 11/09/18 Page 1 of 33

RECEIVED SOMY DOCKET UNIT

D. GEORGE SWEIGERT, C/O P.O. BOX 152 MESA, AZ 85211

2018 NOV -9 PM 3: 52

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK (FOLEY SQUARE)

D. GEORGE SWEIGERT

Case No.: 1:18-cv-08653-VEC

Judge Valerie E. Caproni

VS.

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JASON GOODMAN

Magistrate Judge Stewart D. Aaron

Defendant

Plaintiff,

PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

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PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

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TO THE CLERK OF THE COURT AND ALL INTERESTED PARTIES. NOW COMES THE PRO SE

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Plaintiff (Counter Defendant Sweigert), a layman non-attorney who is acting in the capacity of private attorney

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general in a public interest lawsuit, to respectfully serve a REPLY IN OPPOSITION to the Defendant's "SHOW

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CAUSE" pleading, appearing as Doc. No. 49, filed 10/26/2018 (herein "SHOW CAUSE papers").

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I hereby attest that the pleadings herein accurate and true under the penalties of perjury. Further, I hereby attest that

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the attached exhibits are accurate and true copies of source documents as described.

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Signed this ____ day of November, 2018

EPILEU: THE

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Daintiff, D. George Sweigert

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Pro se plaintiff acting as private attorney general

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PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

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BACKGROUND

- 1. The latest pleading of Defendant Goodman is telling (his "SHOW CAUSE" papers, Doc. No. 49, 10/26/2018). Goodman continues to express his fondness for slinging slurs, insinuations and smears at the Plaintiff without providing any evidence whatsoever to back up those conclusory remarks. The Defendant avers that the Plaintiff is "deceptive nature" (line 21, page 2 [1.21,p.2] "SHOW CAUSE" papers) and someone who is committing "fraud on the court" [1.2,p.3]. Defendant Goodman avers the Plaintiff of distributing "almost daily social media posts" that are "taunting, harassing and defamatory" (1.11,p.2).
- 2. As the Court will learn, although Defendant Goodman maintains a video library of the Plaintiff's previous creative works, Goodman attaches no evidence to back-up his slurs, smears and insinuations of criminal activity. These issues shall be addressed herein; but, are not the focus of this instant pleading.
- 3. Defendant Goodman in his "SHOW CAUSE" papers has (1) failed to contemporaneously file a <u>Certificate of Service</u> (third occurrence of this negligence) with the "SHOW CAUSE" papers, (2) has inaccurately referred to the PLAINTIFF as the DEFENDANT in the title of the pleading, (3) has not filed a verified pleading as required by <u>S.D.N.Y. Local Rule 7.1</u>, and (4) provides unverified and unauthenticated "evidence", etc.
- 4. As a preliminary matter N.Y. Civil Practice Law and Rules (CPLR) § 3022 provides the foundation for this Court, and the Plaintiff, to ignore Defendant Goodman's latest act of frivolity. CPLR § 3022 states, "when a pleading is required to be verified, the recipient of an unverified or defectively verified pleading may treat it as a nullity...". (*Lepkowski v State of New York*, 1 NY3d 201, 210 [2003]; *citing Matter of Miller v Board of Assessors*, 91 NY2d 82, 86 [1997])"
- 5. Although the Plaintiff has the right to ignore the Defendant's "SHOW CAUSE" pleading as a legal nullity (per CPLR § 3022), the Court should be made aware of the Defendant's unceasing extra-judicial conduct, which is described herein.

FACTS

- Attached as EXHIBIT ONE [Exh.1] is an accurate (and verified) reproduction of an envelope 6. sent by the Defendant to the Plaintiff at the mailing address given to the Clerk of the Court. EXHIBIT ONE [Exh.1] clearly demonstrates that the Plaintiff is in fact receiving mail from the Defendant – a point in contention with the Defendant. Apparently, a retuned envelope is all the proof that Goodman needs to accuse the Plaintiff of committing "mail fraud" and "fraud upon the court" with a news reporter from the Kremlin-friendly "SPUTNIK" network (as seen in EXHIBIT THREE [Exh.3] discussed below).
- In his "SHOW CAUSE" papers Goodman states, "[I]n an effort to move this action forward 7. swiftly, Defendant counterclaimant Goodman has also attempted to serve Plaintiff counterdefendant Sweigert via electronic mail. [1.10-11,p.2]". The Court will note that the Plaintiff has never agreed to service by electronic mail based on Defendant Goodman's REFUSAL to accept service via electronic mail.
- Attached as EXHIBIT TWO [Exh.2] is Defendant Goodman's response to the transmission of 8. the South Carolina Amended Complaint (Doc. No. 5, 06/29/2018) to Defendant Goodman's e-mail address. One could say that the Plaintiff "in an effort to move this action forward swiftly" attempted to serve the Defendant with the South Carolina Amended Complaint via electronic mail. Displayed below is Defendant Goodman's response to receiving an electronic copy of the South Carolina Amended Complaint via electronic mail.

Original message sent by Plaintiff [Exh.2]:

On Jun 30, 2018, at 2:23 PM, Spoliation Notice < spoliation-notice@mailbox.org > wrote: Dear Sir:

Attached are legal documents for your court case.

You have been electronically served.

Thank you.

Response from Defendant [Exh.2]

On June 30, 2018 at 4:16 PM Jason Goodman < truth@crowdsourcethetruth.org wrote:

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PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

1.04:52 GOODMAN:

Hire a process server Dave. While you are doing that, you should know I will do my very best to see you prosecuted for harassment, cyber bullying and whatever else the law will allow. You are a menace to the public, a danger to yourself and others, a disgrace to the military (if in fact you ever served, where is that DD214?) and very likely criminally insane. Your email below constitutes continued harassment. You have been instructed not to contact me or publicly speak about me. You have submitted false statements to the Federal Court.

- 9. As Mr. Goodman refused electronic service of the South Carolina Amended Complaint (Doc. No. 5, 06/28/2018) via the e-mail of 6/30/2018 [Exh.2] Defendant Goodman should not believe he has a right to presume on the Plaintiff and force a reverse electronic service on the Plaintiff without prior written permission (see CPLR § 308).
- On 10/26/2018 Defendant Goodman widely disseminated in a pervasive manner a video podcast featuring a LEE STRANAHAN, reporter of the Kremlin-friendly news-service "SPUTNIK". During that podcast (attached as **EXHIBIT THREE [Exh.3]**) Defendant Goodman accuses the Plaintiff of "mail fraud" and "fraud on the court" (see time mark1.04:52 [**Exh.3**]).
 - I have been busy with my own things. Talking about lawsuits I have been answering lawsuits from Dave Sweigert we are going to be doing some more talking about that. I was just down at the .. uh.. 500 Pearl Street [laugh] at the Federal Court building submitting a document [Doc. No. 49, 10/26/2018]. It appears Dave Sweigert may not sure but there's evidence that indicates that he may be .. uh .. submitting fraudulent documents. Mail fraud. [emphasis added][Exh.3]
- Attached as **EXHIBIT FOUR [Exh.4]** is an e-mail message from Defendant Goodman in which he states he possess at least 400 video productions that purported were created by the Plaintiff to attack Goodman. Excerpts are displayed below [**Exh.4**]. "He" refers to the Plaintiff.

He has made over 400 harassing, seemingly psychotic videos antagonizing and defaming me, naming me by name and falsely accusing me of a wide range of crimes in publicly posted videos with thousands of on line views.

I have preserved not only all video, email and other electronic activity I have engaged in for the past year, I have also preserved his harassing emails, videos and other communications. Just this past month, when he brought his frivolous civil suit in a poor attempt to frame me for a bomb hoax staged by his brother and their associates, I posted hundreds of his harassing videos to YouTube as evidence of his activities. Within

hours, David Sweigert aggressively acted to interface with YouTube and have the videos removed.

- 12. In the "SHOW CAUSE" papers Defendant Goodman states that the Plaintiff has made "taunting, harassing, and defamatory YouTube videos" [ln.25-26,p.1]). This is a familiar theme of the Defendant namely that the Plaintiff has created video content that is "taunting, harassing, and defamatory" [ln.25-26,ln.1]. However, the Defendant never presents any evidence of these "YouTube videos". None.
- By his own admission, Defendant Goodman possess a literal library of allegedly "harassing, seemingly psychotic videos antagonizing and defaming me...[Exh.4]". Interestingly, the Defendant has never provided a shred from this mountain of evidence to the Court to support any claims related to "harassment" and "false statements", etc. Following the Defendant's logic, he has the evidence to prove the misconduct of the Plaintiff; but, he doesn't feel as if he needs to provide this evidence to back up his slurs, insinuations, allegations and other smears.
- 14. It is instructive to note that Defendant Goodman was a key participant in a widely disseminated social media public relations smear campaign directed against the Plaintiff in May of 2018 known as the "SWEIGERT TIME PHONE HACK". Attached as EXHIBIT FIVE [Exh.5] are the YouTube search results for the term "SWEIGERT TIME PHONE HACK". One such video production widely disseminated in a pervasive manner by Defendant Goodman is attached as EXHIBIT SIX [Exh.6]. It is instructive to review the video description of [Exh.6].

George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone. Why has Quinn Michaels dubbed this the "time phone" and how does it connect to William Randolf Hearst and Warren Buffett?

As the Court will learn, Defendant Goodman with his sidekick Quinn Michaels (aka Korey Atkin), published a series of video productions that were widely disseminated in a pervasive manner about the Plaintiff's father (George H. Sweigert) and possible links the Sweigert family has to secret societies. The Honorable William T. Sweigert, a federal jurist in Sacramento, CA was also included in these slurs.

16. The overall premise of this Goodman/Michaels (Atkin) video series (**SWEIGERT TIME PHONE HACK**) was that the Sweigert Family was linked to "deep state" pedophiles that were operating in the Covenant Church network to secure children for blood sacrifices [**Exh.5**]. Supposedly, this horrific narrative was backed up by the "research" of Quinn Michaels (self-proclaimed gang-stalker of the mother of his estranged teenage son). The alleged objective of these productions was to incite the murder of the Plaintiff by a gullible and naïve follower of Goodman and Michaels (Korey).

17. As just one example of the dehumanizing attacks of Goodman/Michaels (Atkin). As shown in **EXHIBIT SIX [Exh.6]** Defendant Goodman and his sidekick Korey Atkin painted a picture of the Plaintiff as a CIA contractor running cocaine in Nicaragua while operating radio equipment.

07:07 GOODMAN: George Harry Sweigert was a radio operator in World War Two. Of course, his other son David Sweigert — who has relentlessly pursued you and I — uh, I may have mistakenly said the he was flying cocaine as a CIA contractor during the Iran-Contra scandal. It seems more likely that he was just operating the radios for the CIA contractors that were flying cocaine. [Goodman smiles][emphasis added]

(Internet URLS:

https://www.youtube.com/watch?v=r7IUIqVpOpg [04/07/2018] and https://www.youtube.com/watch?v=p5dl2PZpk5o [05/06/2018])

In June 2018 Quinn Michaels (aka Korey Atkin) created another video series with Defendant Goodman known as "#STOPTHESACRIFICE". According to Quinn's "research", it was implied that the Plaintiff was planning a series of baby sacrifices on June 14, 2018 (curiously the one year anniversary of the Port of Charleston, South Carolina "dirty bomb hoax"). In fact, Quinn published video productions in a widely disseminated and pervasive manner to offer bounties for information on the location of the Plaintiff while Quinn was living out of his car in Mt. Shasta, CA. Quinn (Korey Atkins) published videos on several media platforms seeking, searching and attempting to locate the Plaintiff. The premise was that the Plaintiff had to be stopped from committing these planned atrocities.

LAW AND ARGUMENT

DEFENDANTS PAPERS ARE IMPROPER

PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

ANSWER (Doc. No. 35, 10/10/2018) to be at nest academic and at worst the height of frivolity. The Court's docket has a wealth of information and arguments filed by the Plaintiff to support the rationale that the ANSWER is a pure legal nullity on its face (see CPLR § 3011). To amplify this point the Plaintiff incorporates the below cited pleading as if fully restated herein.

11/01/2018 57

NOTICE OF PLAINTIFF'S AMENDED MOTION PURS. TO FRCP RULE 12(F)TO STRIKE DEFENDANT'S "ANSWER". Document No. <u>35</u>. Document filed by D George Sweigert.(sc) (Entered: 11/05/2018)

- In general terms, the Defendants ANSWER, just like his "SHOW CAUSE" papers, have failed to comply with CPLR § 3013, CPLR § 3014 and CPLR § 3024 (to include SDNY Local Rule 7.1 for the "SHOW CAUSE" papers). In these papers Defendant simply ping pongs back and forth between familiar themes about "harassment, cyber-staking", "taunting", etc.
- 21. It would be instructive for the Court to take judicial notice that all parties to this litigation are **pro**se litigants. Defendant Goodman should behave as any other litigant and be made to comply with the appropriate rules of the Honorable Court of the SDNY and the appropriate rules promulgated by the New York Legislature.

 Plaintiff is on an equal footing with the Defendant, and the Plaintiff has complied with the rules of this Court and the N.Y. Legislature (CPLRs).
- CPLR § 3013 provides that "[s]tatements in a pleading shall be sufficiently particular to give the court and parties notice of the transactions, occurrences, or series of transactions or occurrences, intended to be proved and the material elements of each cause of action or defense. CPLR § 3014 provides that "[e]very pleading shall consist of plain and concise statements in consecutively numbered paragraphs." It further provides that "[e]ach paragraph shall contain, as far as practicable, a single allegation".
- As the Court is well aware, the bulk of the claims presented by Defendant Goodman's unverified ANSWER and "SHOW CAUSE" papers contain incoherent conclusory statements. These papers give no practical notice to the Plaintiff, or the Court, as to what transactions, occurrences or series of transactions or occurrences

Goodman intends to prove or defend against. It remains a perplexing matter to guess as to what relief the Defendant Goodman is seeking in the "SHOW CAUSE" papers. A reading of the Defendant's papers in totality suggests a lack of clarity as to what type of relief Goodman expects from this Court.

Additionally, the Defendant as yet to correct the flawed unverified ANSWER (Doc. No. 35, 10/10/2018) although Goodman has been warned in letters and pleadings (as the wealth this Court's docket suggests).

FRAUD ON THE COURT ALLEGATIONS INAPPROPRIATE

- 25. In the "SHOW CAUSE" papers Defendant Goodman desires this Court to "issue an order requiring Plaintiff/Counter-defendant Sweigert to appear and show cause as to his conduct of changing addresses and submitting a false address in the record of these proceedings and to use an appropriate sanction against plaintiff/Counter-defendant Sweigert for fraud upon this court." [Ins.26-27,pg.2 and Ins.1-2,pg.3 of Doc. 49, 10/26/2018 "SHOW CAUSE" papers].
- 26. If Defendant Goodman is indeed seeking an order from this Court against the Plaintiff for "fraud upon the court", then the burden has been placed upon the Defendant (Goodman) to demonstrate such fraud. *Tooker v Schwartzberg* 2015 NY Slip Op 31620(U), August 17, 2015 Supreme Court, Suffolk County Docket Number: 9463/14 Judge: Paul J. Baisley. Quoting in relevant part:

"Other than her conclusory allegations, however, plaintiff has set forth no facts to establish that the movants, or any of the defendants, committed a fraud on the Court or violated Judiciary Law §487 in connection with the foreclosure action. With regard to the former, the Court of Appeals recently held that: "in order to demonstrate fraud on the court, the non-offending party must establish by clear and convincing evidence that the offending 'party has acted knowingly in an attempt to hinder the fact finder's fair adjudication of the case and his adversary's defense of the action" [citations omitted). A court must be persuaded that the fraudulent conduct, which may include proof of fabrication of evidence, perjury, and falsification of documents concerns 'issues that are central to the truth-finding process' [citation omitted].

PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

- 27. Indeed, even if the Court were to assume that there has been a "mistake, omission, defect and/or a irregularity" with the Plaintiff's change of address pleading (see Doc. No. 10, 08/06/2018 and/or Doc. No. 31, 10/02/2018) the corrective action is offered by CPLR § 2001.
- 28. Defendant Goodman has fatally failed to demonstrate how a non-adjudication issue (such as a mail delivery error) has had any consequence to the fair adjudication of this present litigation or how this alleged "mail fraud" is prejudicial against the Defendant. Defendant Goodman's "fraud upon the court" argument is especially weak in the light of **EXHIBIT ONE** [**Exh.1**] which indicates the Plaintiff **DID** receive communications from the Defendant.
- Plaintiff on 10/11/2018 places the Defendant under a greater cloud of suspicion than it does the Plaintiff. It is instructive for this Court to note that the one and only time the Defendant has filed an appropriate Certificate of Service (as required by F.R.C.P. Rule 5) is when Goodman sent the malformed electronic file to the Plaintiff on 10/11/2018 (the Plaintiff never gave consent to electronic service of documents). This issue is more fully described in Docket No. 57, 11/01/2018 (NOTICE OF PLAINTIFF'S AMENDED MOTION PURS. TO FRCP RULE 12(F)TO STRIKE DEFENDANT'S "ANSWER) which is hereby cited and incorporated by reference as if fully restated herein.

GOODMAN'S USE OF EXTRA-JUDICIAL FORUMS TO TRADE LIBEL PLAINTIFF

- The widely disseminated broadcast in a pervasive manner of "mail fraud" and "fraud upon the court" allegations (against the Plaintiff) with a news-reporter from the Kremlin-friendly "SPUTNIK" network [Exh.3] casts a longer shadow of suspicion over Defendant Goodman's true motives with regards to this mailing error. Again, such public shaming shenanigans underscore the need for a "gag" order to be issued against Defendant Goodman (the commercial operator of the CrowdSource The Truth social media empire).
- 31. It is not inconceivable that Defendant Goodman has staged this "incorrect mailing address" incident as a means to provide more derogatory grist to the CSTT social media mill. It is noteworthy that Defendant

Goodman made his case about "mail fraud" and "fraud on the court" before the public, long before he made his case before this Court.

GOODMAN OPERATES AS A COMMERCIAL ENTERPRISE

- 32. The Court will recall that Defendant Goodman has asserted that "CrowdSource The Truth" [CSTT] is a commercial enterprise and collects funds via the wires of the Internet to support a New York charted corporation and a presumed licensed DBA moniker (see Multimedia System (Software) Design, Inc, (MDSI) and/or 21st Century 3D (21c3D)) [10-RJN].
- On trademark registration application (filed 1/10/2018) for the mark "Crowdsource The Truth" (CSTT), the applicant MSDI, via Jason Goodman, provided the address "6s 252 7th Avenue New York NEW YORK 10001" to the U.S. Patent and Trademark Office (USPTO). (USPTO serial number 87752970). This confirms the commercial / trade speech status of Defendant Goodman and his CSTT social media empire.
- 34. Considering the status of Goodman's trade / commercial speech issues of CSTT the alleged defamatory statements (none specified) attributed to Plaintiff Sweigert may merely be non-actionable opinions. See *Glazier v. Harris*, 99 A.D.3d 403, 404 (1st Dep't 2012) (dismissing defamation claim where plaintiff failed to specify particular words used.).

SUMMARY

- 35. Defendant Counterclaimant Goodman offers a jumble of irrelevances, smears and unsubstantiated insinuations without a shred of evidence in his legally nullified and moot papers (filed without an accompanying Certificate of Service and in open defiance of SDNY Local Rule 7.1).
- 36. Goodman now expects this Court to behave like his naïve audience and accept his stunningly delusional conspiracy theories which is the grist in the mill of the CrowdSource The Truth social media podcast empire.

- Moreover, the Defendant's conclusory allegations, vague accusations and references to ambiguous allegations of "mail fraud" and "fraud upon the court" provides no smoking gun of evidence in a pleading that is completely legally insufficient. Goodman has failed to allege specific actions taken by the Plaintiff to injure the Defendant or to prejudice his standing in this litigation.
- 38. Goodman cannot correct the fatal procedural flaws and insufficiencies that are embedded in his papers. In fact, the sloppy and cavalier manner in which Goodman approaches this Court (no filings of a Certificate of Service [third time]) underscores Goodman's contempt for the entire federal judicial framework. The utter contempt that Goodman displays, lack of adherence to even basic procedures of the federal courts, and the filing of vague and ambiguous (wishy washy) claims demand that this Court deny all relief requested by Goodman in the legally moot "SHOW CAUSE" pleading.

ATTESTATION

I hereby attest that the foregoing is accurate and true under the penalties of perjury. Further, I hereby attest that the attached exhibits are accurate and true copies of source documents located on the Internet.

Signed this ____ day of November, 2018

Plaintia, D. George Sycigert

Pro se plaintiff acting as private attorney general

EXHIBITS

I hereby attest that the foregoing is accurate and true under the penalties of perjury. Further, I hereby attest that the attached exhibits are accurate and true copies of source documents located on the Internet.

Signed this ____ day of November, 2018

Plaintiff, D. George Sycigert

Pro se plaintiff acting as private attorney general

PLAINTIFF'S REPLY IN OPPOSITION TO "MOTION FOR RULING TO SHOW CAUSE FOR DEFENDANT'S CONDUCT OF PROVIDING FALSE ADDRESS AND PERSISTENT EFFORTS TO AVOID SERVICE"

EXHIBITS

DECLARATION / ATTESTATION PURSUANT TO LOCAL RULE 7.1

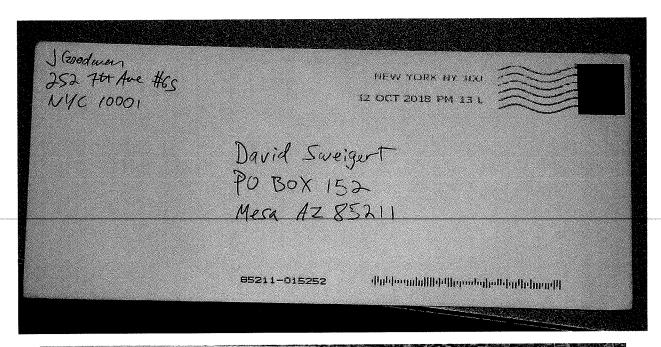
I hereby attest that the information stated herein is true and correct to the best of my ability under penalties of perjury. Contained herein are unaltered screen captures of Internet images.

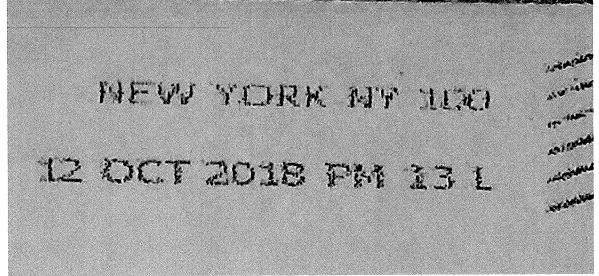
Signed this day of November, 2018

D. George Syleigert, pro se plaintiff

EXHIBIT ONE

ENVELOPE MAILED BY DEFENDANT TO PLAINTIFF





J Goodwern 252 7th Ave #65 NYC 10001

David Sweigert
POBOX 152
Mesa AZ 85211

EXHIBIT TWO

ATTEMPT TO ELECTRONICALLY SERVE

DEFENDANT ON JUNE 30, 2018 AND HIS REPLY

Re: Continued litigation hold duty for electronic records in RICO civil suit

<u>Jason Goodman</u><truth@crowdsourcethetruth.org>
6/30/2018 8:39 PM

To <u>Spoliation Notice</u> Copy <u>Dave Acton</u>, <u>Jason</u>
<u>Goodman</u>, <u>Kevin.L.Maehler@uscg.mil</u>, <u>feedback</u>, <u>George</u>

<u>Webb</u>, <u>dutyofficer@ncric.ca.gov</u>, <u>msp.superintendent@maryland.gov</u>, <u>OFL@usdoj.gov</u>,
<u>Colin Sullivan</u>, <u>generalcounsel@fmc.gov</u>, <u>lawenforcement@paypal.com</u>

Dave this is improper service and everyone on this message knows, no actual lawyer sends anonymous emails. Discontinue your harassment immediately and seek mental health treatment before you do more damage than you already have.

[emphasis added]

On Jun 30, 2018, at 2:23 PM, Spoliation Notice < spoliation-notice@mailbox.org > wrote:

Dear Sir:

Attached are legal documents for your court case.

You have been electronically served.

Thank you.

On June 30, 2018 at 4:16 PM Jason Goodman < truth@crowdsourcethetruth.org> wrote:

Hire a process server Dave. While you are doing that, you should know I will do my very best to see you prosecuted for harassment, cyber bullying and whatever else the law will allow. You are a menace to the public, a danger to yourself and others, a disgrace to the military (if in fact

you ever served, where is that DD214?) and very likely criminally insane. Your email below constitutes continued harassment. You have been instructed not to contact me or publicly speak about me. You have submitted false statements to the Federal Court.

On Jun 30, 2018, at 8:39 AM, Dave Acton <\i108\text{whd@gmail.com}\text{ wrote:}

Dear Sir:

This is your electronic service of the Amended Complaint with Exhibits.

Thank you for your cooperation.

[emphasis added]

EXHIBIT THREE

YouTube video production on the "Jason Goodman" channel

https://www.youtube.com/watch?v=E3auCQb4o0A

October 26, 2018 [10/26/2018]



1.04:52 GOODMAN: I have been busy with my own things. Talking about lawsuits I have been answering lawsuits from Dave Sweigert — we are going to be doing some more talking about that. I was just down at the .. uh.. 500 Pearl Street [laugh] at the Federal Court building submitting a document [Doc. No. 49, 10/26/2018]. It appears Dave Sweigert may — not sure — but there's evidence that indicates that he may be .. uh .. submitting fraudulent documents. Mail fraud. [emphasis added][Exh.3]

EXHIBIT FOUR

DEFENDANT GOODMAN ADMITS HE HAS 400 VIDEOS IN HIS POSSESSION

Re: Continued litigation hold duty for electronic records in RICO civil suit

<u>Jason Goodman</u><truth@crowdsourcethetruth.org>

6/30/2018 1:15 AM

To Spoliation Notice, j108whd@gmail.com Copy feedback, George Webb, Colin Sullivan, dutyofficer@ncric.ca.gov, msp.superintendent@maryland.gov, OFL@usdoj.gov, msp.hq@maryland.gov, Jason

Goodman, generalcounsel@fmc.gov, Kevin.L.Maehler@uscg.mil

As a matter of interest to the military, law enforcement and government officials copied on this message, the anonymous sender is David George Sweigert. This individual has been spearheading a persistent harassment campaign against me for the past 12 months. I believe he is motived to do this because of my journalist endeavors to reveal criminal activity that I believe he and his associates are involved in. He is actively attempting to engage in two baseless, frivolous civil suits against me and has made multiple false statements in court submitted documents to do so.

He has made over 400 harassing, seemingly psychotic videos antagonizing and defaming me, naming me by name and falsely accusing me of a wide range of crimes in publicly posted videos with thousands of on line views. He is actively attempting to ruin my public reputation with lies and defund my business by harassing my associates and patrons.

In addition to suffering from what appears to be obvious mental illness, he is a sexual deviant, publicly admitting to wife swapping with his own brother George Webb Sweigert, also copied on this message.

David Sweigert lacks the confidence in his "information" to send a legitimate email from either his own address or a lawyer and opts instead, to use this anonymous "Spoliation Notice" account.

The bizarre irony here is that David Sweigert is actively and persistently engaged in spoliation of

evidence including his harassing videos. I have preserved not only all video, email and other electronic activity I have engaged in for the past year, I have also preserved his harassing emails, videos and other communications. Just this past month, when he brought his frivolous civil suit in a poor attempt to frame me for a bomb hoax staged by his brother and their associates, I posted hundreds of his harassing videos to YouTube as evidence of his activities. Within hours, David Sweigert aggressively acted to interface with YouTube and have the videos removed.

I have done nothing of the sort. His most recent email, to which this is a response, is only more evidence of his persistent, ongoing harasment.

In my personal opinion he is a dangerous, mentally unstable menace and should be prosecuted for these actions. He has deliberately hidden any home or business address complicating the process of obtaining a restraining order against him.

I would welcome contact from any of the government, military or law enforcement officials copied on this email so I can share my evidence and hopefully gain your assistance in bringing the Sweigert bothers to justice. The Sweigert brothers are a danger to the public and possibly themselves and are engaged in what appears to be a range of criminal activities.

Thank you for your attention, I sincerely apologize that Mr Sweigert insists on wasting all of our time in this manner.

Jason Goodman 323-744-7594

On Jun 29, 2018, at 5:15 PM, Spoliation Notice < spoliation-notice@mailbox.org> wrote:

To: Mr. Jason Goodman.

You are under a continued duty to preserve all electronic evidence in your possession for all your electronic mail accounts.

Some of your newly identified e-mail accounts are listed in the TO: and CC: message blocks.

The same practical effects of this obligation apply to Mr. George Webb as well.

Warm regards,

Evidence Preservation Team

EXHIBIT FIVE

YOUTUBE SEARCH TERMS "SWEIGERT TIME PHONE HACK"



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels

Crowdsource the Truth 2 • 10K views • Streamed 7 months ago

George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone.



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels

Jason Goodman • 1.4K views • 6 months ago

Originally posted April 7, 2018 George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the ...



The Time Phone Hack Mass Ritual - Deception

MrCati • 3.4K views • 6 months ago

This report will show and discuss how the coded elements contained within the three words, (Time Phone Hack), which are words...



Time Phone Hack -WHO CREATED IT? and What is it's PURPOSE? EXCLUSIVE VIDEO of it's CREATOR

YouTubeStory2 Chinada3 • 1.4K views • 6 months ago

TimePhoneHack a Game played Online... for kids Ages 14yrs to 19yrs old Welcome in to the Mind of Quinn "DingBot" Michaels ...



Time Phone hack? Quinn Michaels starts a Crowdstalking campain. Legal Evidence

Danger Zone • 1.1K views • Streamed 6 months ago

Multistreaming with https://restream.io/ Multistreaming with https://restrea Music and getting in the mix with Puzzle and such. m.io/ ...



Protect the "Time Phone" - Time Phone Firewall 🐧 #TimePhoneFirewall

Titus Frost 1984 • 1.4K views • Streamed 6 months ago

The 'Time Phone' a phone that connects us in the 'conspiracy', to the future. This is how 'WE' have been able to predict future ...



Time Phone Hack? Quinn Michaels New Gang stalking Campaign

Defango • 4.7K views • 6 months ago

ime pHone Hack Quinn Michaels gets his follower to actively harrass defango. GANGSTALKING 101 for his patreon group tuned ...



Time Phone Hack-Quinn Michaels New Gang Stalking Campaign-GETS ATTACKED BY DEFANGO's Gang Stalk Army

YouTubeStory2 Chinada3 • 845 views • 6 months ago

DEFANGO asks his viewers to "Crowd Strike" Quinn's Videos -because our "DingBot" Quinn asked his viewers to Crowd Strike ...



Exploring The Strange Life Span of Deep State Lifelog with Quinn Michaels

Jason Goodman + 2.1K views + 6 months ago

Originally posted April 14, 2018 Quinn continues to reveal details of the Sweigert Time Phone and how Elvis was an early ...

EXHIBIT SIX

YOUTUBE VIDEO PRODUCTION

Internet URL: https://www.youtube.com/watch?v=r7IUIqVpOpg

April 7, 2018 [04/07/2018]

And

Internet URL: https://www.youtube.com/watch?v=p5dl2PZpk5o

May 6, 2018 [05/06/2018]



Hack to the Future - Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels

10,494 views











SUBSCRIBE 8.5K

George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone. Why has Quinn Michaels dubbed this the "time phone" and how does it connect to William Randolf Hearst and Warren Buffett?

Become a Sponsor of Crowdsource the Truth

VIDEO DESCRIPTION

George H. Sweigert (1920–1999) is widely credited as the first inventor to hold a patent for the invention of the cordless telephone. Why has Quinn Michaels dubbed this the "time phone" and how does it connect to William Randolf Hearst and Warren Buffett?

VIDEO TRANSCRIPT

00:27 GOODMAN: Welcome to Saturday April 7th everybody. So this is going to become a

regular segment with my good buddy Quinn Michaels. Hello Quinn.

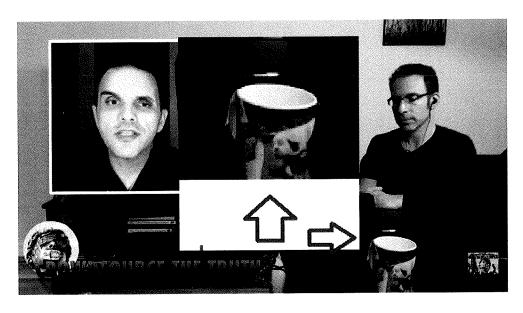
[Quinn replies: Hello everybody].

00:52 GOODMAN: Quinn of course is an Artificial Intelligence expert. He is an amazingly

creative thinker. He has expertise in philosophy. He is studying to be a Buddhist Monk. And he has come out with some of the most amazing

research that I have seen.

[CUT-AWAY SHOWING CRAZY DAVE COFFEE CUP – BELOW]



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels



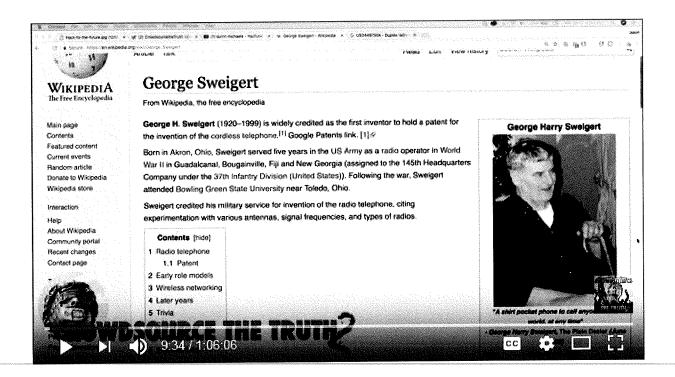
07:07 GOODMAN: George Harry Sweigert was a radio operator in World War Two. Of course, his other son David Sweigert – who has relentlessly pursued you and I – uh, I may have mistakenly said the he was flying cocaine as CIA contractor during the Iran-Contra scandal. It seems more likely that he was just operating the radios for the CIA contractors that were flying cocaine. [Goodman smiles]



07:53 QUINN:

We found another George Sweigert that right around the Patty Hearst incident was removed from the bench in Sacramento and replaced with someone else – supposedly a secret society member.

[CUT-AWAY TO SHOW WIKIPEDIA ENTRY OF GEORGE HARRY SWEIGERT]



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels



10,495 views

22:09 GOODMAN:

I contacted them [FBI] to report what seems to be criminal activity — to me — I am not a law enforcement officer or a lawyer. But, I did have an extensive conversation about the activities of the Sweigerts and some of their apparent associates. So, I am looking forward to a return call from the FBI. And, Mr. David Sweigert keeps generating a lot of false evidence.



Hack to the Future – Exploring the Sweigert, Hearst, Buffett Time Phones with Quinn Michaels



Crowdsource the Truth 2

▶ Subscribe 8,5k

10,495 views

EXHIBIT SEVEN

DECLARATION OF D. GEORGE SWEIGERT

- 1. I hereby make the following statement under the penalties of perjury.
- 2. I have never attempted to commit fraud upon the Honorable Court of the SDNY.
- 3. I am aware that in the months of May and June of 2018 Jason Goodman and Quin Michaels (Korey Atkin) made a series of videos for social media broadcast known as the "SWEIGERT TIME PPHONE HACK".
- 4. These videos indicated to me that Quinn Michaels was actively attempting to ascertain my physical address for the purpose of orchestrating physical harm against me. I took note that Jason Goodman had interviews a self-professed hit man (named Larry Nichols) on his CrowdSource The Truth podcast.

Signed under the penalties of perjury

This day of Number, 2018

Plaintiff, D. George Sweigert

	Case 1:18-cv-08653-VEC-SDA Docu	ment 63 Filed 11/09/18 Page 31 of 33		
1 2	D. GEORGE SWEIGERT, C/O P.O. BOX 152 MESA, AZ 85211	RECEIVED SDNY DOCKET UND 2018 NOV -9 PM 3: 52		
3				
4				
5				
6	IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK			
7	(FOLEY	SQUARE)		
8	D. GEORGE SWEIGERT	Case No.: 1:18-cv-08653-UA		
9	Plaintiff,			
10	vs.			
11	JASON GOODMAN			
12	Defendant	CERTIFICATE OF SERVICE		
13				
14	CERTIFICATE OF SERVICE			
15	The Plaintiff certifies under penalties of perjury that the enclosed documents have been sent via First Class			
16 17	postage paid U.S. Mail to:			
18	Jason Goodman 252 7 th Avenue #6S			
20	New York, NY 10001			
21	PRO SE DIVISION 200 Clerk of the Court			
22	U.S. District Court for the SDNY (FOLEY SQUARE) 500 Pearl Street New York, New York 10007-1312 Respectfully dated this day November, 2018,			
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27	D. 0	GEORGE SWEIGERT		
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	CERTIFICAT	E OF SERVICE		

1	D. GEORGE SWEIGERT, C/O			
2	P.O. BOX 152 MESA, AZ 85211			
3	MESA, AZ 65211			
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	CERTIFICATE OF SERVICE			

Case 1:18-cv-08653-VEC-SDA Document 63 Filed 11/09/18 Page 32 of 33

D. GEORGE SWEIGERT, C/O

MESA, AZ 85211 P.O. BOX 152

2018 NOV -9 PM 3: 53











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